

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13

Dennis & Ericka Morales
DEBTOR : BKY. NO. 19-14648JKF13

**MOTION TO MODIFY DEBTOR'S
CHAPTER 13 PLAN AFTER CONFIRMATION**

1. Debtor filed for protection under Chapter 13 on July 25, 2019.
2. The Chapter 13 plan was confirmed March 18, 2020.
3. Debtor's base amount is \$62,484 with monthly payments of \$1,046.
4. Debtor has already paid \$7,000 to the trustee.
5. Debtor has been adversely affected financially by the pandemic and seek to modify their plan after confirmation pursuant to the Cares Act.
6. Both debtors' have lost their jobs and are currently unemployed.
7. Debtor seeks to extend the plan to a 7-year plan from filing and has separately filed a modified plan as follows;

\$ 7,000 total through April 2020.
\$ 751 for 75 months from May 2020 to July 2026
\$ 63,325

8. The modified plan is supported by the attached amended schedules I and J.
9. The amended plan does not adversely affect the unsecured creditors as the base amount was adjusted to satisfy supplemental attorney fees and the change in trustee commission due to this extra funding.

WHEREFORE, Debtor prays that the Motion to Modify Plan be approved.

Respectfully submitted,

Date: April 20, 2020

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MICHAEL A. CATALDO, ESQUIRE
CIBIK & CATALDO, P.C.

1500 Walnut Street, Ste. 900
Philadelphia, PA 19102